

Faxed to  
RAL 5/23/97 1345

POLREP #3  
VALLEY FORGE NATIONAL HISTORICAL PARK ASBESTOS SITE  
RTE 23 & GULPH RD  
VALLEY FORGE, MONTGOMERY COUNTY, PA 19482  
ATTN: RRC, CHARLIE KLEEMAN  
CC: EARL CRAM, NATIONAL PARK SERVICE

EVENT: EMERGENCY RESPONSE/SITE ASSESSMENT

I. SITUATION (AS OF 1930 HOURS, THURSDAY, 22 MAY 1997)

- A. A PORTION OF VALLEY FORGE (VF) NATIONAL PARK WAS THE SITE OF AN ASBESTOS MANUFACTURING OPERATION PRIOR TO BEING DONATED TO THE PENNSYLVANIA PARK COMMISSION. THE NATIONAL PARK SERVICE (NPS) ASSUMED ADMINISTRATION OF THE PARK IN 1976. AREAS OF THE PARK IN WHICH EXPOSED ASBESTOS HAVE BEEN IDENTIFIED ARE ASSOCIATED WITH OLD ASBESTOS DISPOSAL PITS IN CLOSED QUARRIES ON VF NATIONAL PARK PROPERTY. ADDITIONALLY, AREAS ALONG AN ASBESTOS-CONTAINING MATERIAL (ACM) SLURRY PIPELINE ARE CONTAMINATED WITH ACM SLURRY MATERIAL. SAMPLING OF THE EXPOSED MATERIALS BY NPS HAS CONFIRMED THE PRESENCE OF ASBESTOS. ACCORDING TO VF NPS EMPLOYEES, THE BUILDINGS WHERE ASBESTOS OPERATIONS TOOK PLACE WERE DEMOLISHED AND BURIED IN AT LEAST 3 QUARRIES.
- B. BASED ON OBSERVATIONS DURING A JOINT INSPECTION OF THE VF NATIONAL PARK CONDUCTED BY OSC KOOB, AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY (ATSDR) REPRESENTATIVE CHARLES WALTERS, AND VF NPS OFFICIALS, THE OSC DETERMINED THAT THE SITE CONDITIONS MET THE CRITERIA OF AN EMERGENCY REMOVAL ACTION. PURSUANT TO DELEGATION OF AUTHORITY 14-1-A, THE OSC OBLIGATED \$200,000 TO INITIATE AN EMERGENCY REMOVAL ACTION TO STABILIZE AND, WHERE APPROPRIATE, DISPOSE OF HAZARDOUS SUBSTANCES (ACM) AT THE SITE.
- C. PERSONNEL ON SITE: EPA-1, VFNPS-1, SATA-4, ERCS-9
- D. WEATHER: SUNNY AND MILD, TEMPERATURES IN THE LOW 70'S.

II. ACTIONS TAKEN

- A. ERCS CONTRACTOR MOBILIZED PERSONNEL AND EQUIPMENT TO BEGIN STABILIZATION EFFORTS IN ACM AREAS. STABILIZATION EFFORTS BEGAN IN AREAS IDENTIFIED WITH EXPOSED ASBESTOS AND AS MOST ACCESSIBLE BY PUBLIC. ACM AREAS WERE PRIORITIZED ACCORDING TO ABOVE CRITERIA. ERCS BEGAN INSTALLATION OF HIGH-VISIBILITY SNOW FENCING AND BEGAN WETTING EXPOSED ACM AREAS IDENTIFIED AS HIGH PRIORITY ALONG COUNTY LINE ROAD. A TOTAL ESTIMATE OF 2000 FEET OF SNOW FENCING HAS BEEN INSTALLED BY ERCS TO DATE.
- B. SATA CONTINUED HISTORICAL RESEARCH IN PREPARATION FOR EXTENT OF CONTAMINATION STUDY.
- C. SATA STAGED THE MOBILE COMMAND POST AT THE VFNHP VISITORS CENTER IN PREPARATION FOR MEMORIAL DAY WEEKEND

ACTIVITIES.

- D. OSC KOOB CONTACTED EPA REGION III SAFETY OFFICER (J. MARKS) TO DISCUSS PPE CONCERNS FOR WORKERS CONDUCTING INTRUSIVE OPERATIONS IN ACM AREAS. EPA SAFETY OFFICER MARKS CONFIRMED THAT LEVEL "C" WITH HEPA CARTRIDGES WOULD PROVIDE ADEQUATE PROTECTION DURING INTRUSIVE OPERATIONS.
- E. NPS CRAM IDENTIFIED AN ADDITIONAL AREA OF SUSPECTED ACM NEAR MAINTENANCE FACILITY. NPS CRAM COLLECTED A BULK SAMPLE OF THE MATERIAL AND SHIPPED IT FOR 24-HOUR TURNAROUND PLM ANALYSIS.

III. FUTURE ACTIONS

- A. ERCS TO CONTINUE WETTING, FENCING, AND BANNER GUARDING OPERATIONS IN AREAS OF CONCERN
- B. ERCS TO BEGIN INSTALLATION OF POLY SHEETING COVER IN AREAS OF SIGNIFICANTLY EXPOSED ACM.
- C. ERCS TO MOBILIZE ADDITIONAL PERSONNEL TO CONDUCT OPERATIONS.
- D. SATA TO CONTINUE HISTORICAL RESEARCH IN PREPARATION FOR EXTENT OF CONTAMINATION STUDY.
- E. ALL PUBLIC RELEASES TO BE COORDINATED THROUGH UNIFIED COMMAND, INCLUDING OSC KOOB, NPS, AND STATE REPRESENTATIVES.

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F. KEVIN KOOB, OSC  
U.S. EPA REGION III  
PHILADELPHIA, PA 19107